

Deverie J. Christensen  
Nevada State Bar No. 6596  
Katlyn M. Brady  
Nevada State Bar No. 14173  
**JACKSON LEWIS P.C.**  
300 South Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
Email: [deverie.christensen@jacksonlewis.com](mailto:deverie.christensen@jacksonlewis.com)  
[katlyn.brady@jacksonlewis.com](mailto:katlyn.brady@jacksonlewis.com)

*Attorneys for Defendant  
Southwest Medical Associates, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MARGUERITE BRATHWAITE, M.D., an  
individual,

Plaintiff,

v.

SOUTHWEST MEDICAL ASSOCIATES,  
INC., an active Nevada domestic Corporation;  
DOES 1-10 and ROE ENTITIES 1-10,  
inclusive.

Defendants.

Case No.: 2:22-cv-00729-JCM-NJK

**STIPULATION TO EXTEND THE  
JANUARY 5, 2024, DEADLINE TO  
SUBMIT PROPOSED FINDINGS OF  
FACT AND CONCLUSIONS OF LAW**

**First Request**

IT IS HEREBY STIPULATED by and between Plaintiff Marguerite Brathwaite, M.D., (“Plaintiff”), through her counsel F. TRAVIS BUCHANAN, ESQ., of the law firm F. TRAVIS BUCHANAN, ESQ., & ASSOCIATES, PLLC., and RODNEY S. DIGGS, of the law firm IVIE McNEILL WYATT PURCELL & DIGGS, and SOUTHWEST MEDICAL ASSOCIATES, INC., (“Defendant”) through its counsel JACKSON LEWIS P.C., that the current January 5, 2024, deadline to file proposed findings of fact and conclusions of law be extended to January 12, 2024.

1. On October 26, 2023, the parties participated in an evidentiary hearing on Defendant’s Motion to Enforce Settlement Agreement. ECF No. 44.

1           2.       On November 28, 2023, the Court ordered the parties to purchase a transcript of the  
2 October 26, 2023, evidentiary hearing and prepare proposed findings of fact no later than January 5,  
3 2024. ECF No. 79

4           3.       On November 29, 2023, the parties ordered a copy of the October 26, 2023, hearing  
5 transcript. On December 7, 2023, the parties received a copy of the hearing transcript.

6           4.       As the Court has not yet ruled on the pending Motion to Enforce Settlement  
7 Agreement, the parties began the process of each preparing proposed findings of facts and  
8 conclusions of law for the Court's review and consideration.

9           5.       Beginning on December 17, 2023, counsel for Defendant Deverie Christensen was  
10 out of the office due to an illness. Further, Ms. Christensen has been out of the office from  
11 December 20 through at least January 2, 2024, due to her minor daughter undergoing major surgery  
12 and recovery.

13           6.       As a result of Ms. Christensen's illness and her daughter's surgery, Defendant is  
14 unable to complete its proposed findings of fact and conclusions of law before January 5, 2024.

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

DATED this 2nd day of January, 2024.

Deverie J. Christensen, Bar No. 6596  
Katlyn M. Brady, Bar No. 14173  
300 S. Fourth Street, Ste. 900  
Las Vegas, Nevada 89101  
*Attorneys for Defendant*  
*Southwest Medical Associates, Inc.*

## Page 3 of 3